



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 30, 2017

Derek J. Robinson, BRAC Environmental Coordinator
Department of the Navy
Base Realignment and Closure Program Management Office West
33000 Nixie Way, Building 50
San Diego, CA 92147

Re: EPA Comments on the *Response to Comments on the Technical Memorandum on the Optimized Remedial Alternative for Parcel F, HPNS, San Francisco CA, August 2017*

Dear Mr. Robinson:

Attached are EPA's comments on the *Response to Comments on the Technical Memorandum on the Optimized Remedial Alternative for Parcel F, HPNS, San Francisco CA, August 2017*.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at huang.judy@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Judy C. Huang". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Judy C. Huang, P.E.
Remedial Project Manager

cc:

Nina Bacey, DTSC (via email)
Tina Ures, RWQCB (via email)
Amy Brownell, SFDPH (via email)
Sharon Ohannessian, US Navy (via email)
Danielle Janda, US Navy (via email)

**Review of the Response to Comments on the Technical Memorandum on the Optimized
Remedial Alternative for Parcel F, HPNS, San Francisco CA, August 2017**

Evaluation of the Response to General Comment 1: The response partially addresses the comment. While Section 3.3.2 (KCH Pilot Study) was revised to include additional details related to the in-situ treatment pilot study, the incurred placement cost is not provided. Please ensure that Section 3.3.2 of the Tech Memo includes the incurred placement cost for the in-situ treatment pilot study.

NEW GENERAL COMMENT

1. Attachment V (Assumptions for Cost Estimate, Optimized Alternative) lacks sufficient detail to evaluate the level of effort necessary to implement each of the alternatives. Costs provided in Attachment V are shown as lump sums; however, it is unclear what is included in the lump sum costs. As such, Attachment V does not demonstrate an understanding of the level of rigor that will eventually be necessary to design and implement the remedial alternatives developed. For example, the costs should provide the level of detail outlined in A Guide to Developing and Documenting Cost Estimates During the Feasibility Study, July 2000 (FS Cost Guidance). Further, it cannot be verified that the components of the alternatives that are presented in the Tech Memo were incorporated into the lump sum costs. Please revise Attachment V to include the detail and specificity described in the FS Cost Guidance that reflects the complexity of the proposed remedial alternatives, including sufficient information to verify that required alternative components were included in the costs.